



June 13, 2017

The Honorable Jacqueline Scott Corley
United States Magistrate Judge
United States District Court for the Northern District of California
San Francisco Courthouse
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Waymo LLC v. Uber Technologies, LLC et al.*, Case No. 3:17-cv-00939-WHA

Dear Judge Corley:

Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) submit this letter in opposition to Waymo LLC’s (“Waymo”) Motion to Compel Stroz Friedberg LLC (“Stroz”) to produce documents in response to a subpoena issued by Waymo to Stroz (the “Stroz Subpoena”).

Uber opposes Waymo’s Motion to Compel for the reasons set forth in Uber’s June 9 Motion to Quash the Stroz Subpoena (Dkt. 581). Specifically, Uber opposes the instant Motion to Compel to the extent that the Stroz Subpoena would require the production documents that are protected by Uber’s attorney-client privilege and attorney work product.

With respect to the requests for production in the Stroz Subpoena that Uber did not move to quash, Uber has no objection to Stroz producing responsive, non-privileged documents. Further, Uber also does not object to the production by Stroz of any documents, data, and other materials provided by Anthony Levandowski, Lior Ron, and other diligenced employees to Stroz. Indeed, Uber has instructed Stroz not to retain or destroy any materials provided to it by Levandowski and instead, instructed Stroz to return to Waymo any materials that may possibly contain or reference any Google information. *See* K. Dunn Ltr. to Stroz Friedberg LLC (June 12, 2017) (attached as Ex. 1).

Sincerely,

/s/ Karen L. Dunn

Karen L. Dunn
Counsel for Uber Technologies, Inc. and
Ottomotto LLC

cc: counsel of record; Special Master John Cooper; counsel for Stroz Friedberg, LLC